

364240

Environmental  
Resources  
Management

2666 Riva Road, Suite 200  
Annapolis, MD 21401  
(410) 266-0006  
(410) 266-8912 (fax)  
<http://www.erm.com>

14 July 2000

Reference: 30710.00.01

VIA FACSIMILE AND OVERNIGHT DELIVERY

Ms. Jill Lowe  
Remedial Project Manager  
U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2029



Re: *Dublin NPL Site Feasibility Study (FS)*

Dear Jill:

The purpose of this letter is to provide responses to the comments presented in EPA's 15 June 2000 letter. As indicated in your letter, many of the comments in the 15 June letter are clarifications or expansions to the comments provided in EPA's prior letter dated 23 May. Responses to these comments were already provided by Sequa in our letter to you dated 29 June 2000. The comments that were not previously identified (i.e., not included in the 23 June letter nor discussed during the 30 May meeting between EPA and Sequa) were the subject of our conference call on 7 July. The responses presented herein, including the modified pages to the FS (Attachment 1), are consistent with the agreements reached during the 7 July conference call.

For completeness, all of the comments from EPA's 15 June letter are repeated below followed by Sequa's response.

1. **Comment:** *Page ES-2, fourth paragraph - EPA does not believe that "unique" is an appropriate descriptor for the Dublin Site. A large portion of EPA's groundwater sites have waterlines and TCE in bedrock is very common in Pennsylvania sites.*

**Response:** The following language which was agreed to in the 7 July conference call, has been incorporated into the FS text (see Attachment 1):

"Two features of the Dublin site were integral to the development of this FS".

AR302619



2. **Comment:** *Page ES-3, Footnote 2 – Eliminate this disclaimer. It also appears on pages 2, 8, 42, 65, and 76.*

**Response:** As requested, the footnote has been deleted.

3. **Comment:** *Page 3, third paragraph, first sentence – Delete “a” from between “into” and “an”.*

**Response:** The typographical error has been corrected.

4. **Comment:** *Page 5, last paragraph and Page 6, first paragraph – EPA does not agree that the plume is in steady state. Footnote 5 on page 18 should appear on these pages also.*

**Response:** The footnote that appeared on page 18 (Footnote 5) has been repeated on pages 5 and 6.

5. **Comment:** *Page 19, 2.3.3, first paragraph, third sentence – Delete and replace with “However, given the site-specific circumstances of the Dublin NPL Site, restoration of contaminated groundwater at the source to potable water quality standards may not be practicable.”*

**Response:** The following language, which was agreed to in the 7 July conference call, has been incorporated into the FS text (see Attachment 1):

“However, given the site-specific circumstances of the Dublin NPL Site, restoration of contaminated ground water beneath and in the immediate vicinity of the 120 Mill Street property to potable water quality standards may not be practicable.”

6. **Comment:** *Page 19, 2.3.3, fourth sentence – Change “Dublin NPL Site” to “fire tower well”*

**Response:** As agreed during the 7 July conference call, the fourth sentence of section 2.3.3 will now read as follows:

“More specifically, the technical impracticability of restoring ground water to drinking water quality beneath and in the immediate vicinity of the 120 Mill Street property is based on.....”

7. **Comment:** *Page 19, 2.3.3, first bullet – Add a statement which mentions that the extent of DNAPL has not been defined.*

**Response:** The first sentence in the first bullet will read as follows:

“Although not confirmed nor delineated by field verification, the presence of DNAPL is indicated by empirical data (i.e., TCE concentration  $\geq 1\%$  of its solubility limit in water).....”

8. **Comment:** *Page 20, last paragraph, last sentence – Delete and replace with “Consequently, restoration of all impacted groundwater, in the vicinity of the fire tower well, to its most beneficial use may not be achievable.”*

**Response:** As agreed during the 7 July conference call, the sentence will read as follows:

“Consequently, restoration of all impacted ground water to its most beneficial use, especially in the immediate vicinity of the 120 Mill Street property, may not be achievable.”

9. **Comment:** *Page 22, third paragraph, third sentence – “see footnote 2, page 17” should read “see footnote 5, page 18”.*

**Response:** The footnote reference has been corrected.

10. **Comment:** *Page 22, footnote 7 – Delete this footnote.*

**Response:** The footnote has been deleted.

11. **Comment:** *Page 34, last paragraph, last sentence – Insert “may” between “model” and “overestimate”.*

**Response:** The requested wording change has been made.

12. **Comment:** *Page 34, last paragraph – Add the following to the end of the paragraph, “Alternatively, the model does not consider breakdown or contaminant retardation which could accelerate the effectiveness of the “pump-and-treat” technology. EPA has agreed that the model is not a true representation of natural conditions. The model is being used to assist in the comparison of alternatives.”*

**Response:** Consistent with the discussions of the 7 July conference call, the following wording is proposed:

"Consequently, because the model treats the bedrock aquifer as a homogeneous porous medium, the model may overestimate the effectiveness of "pump-and-treat" technology in restoring ground water quality to MCLs. Additional "real world" conditions that are not considered by the solute transport model are contaminant degradation (although empirical sampling data does not indicate that this is a significant factor at the site) and contaminant retardation. Contaminant degradation, if it is occurring at the site, would accelerate the effectiveness of "pump-and-treat" technology. EPA has agreed that the solute transport model is not a true representation of natural conditions. However, the model can be used to assist in the comparison of alternatives."

13. **Comment:** *Page 43, Alternative 7 title, second line - Remove "a" from before "Pumping".*

**Response:** The typographical error has been corrected.

14. **Comment:** *Page 45, second bullet, last line - "acess" should be "access".*

**Response:** The typographical error has been corrected.

15. **Comment:** *Page 45, Alternative 8, first paragraph, first sentence - Reword the sentence to eliminate the use of the word "extreme".*

**Response:** The requested wording change has been made. Additionally, a global change was made throughout the document to eliminate the word "extreme" when describing Alternative 8.

16. **Comment:** *Page 45, Alternative 8, first paragraph, last sentence - Delete and replace with "DRBC could have concerns because a percentage of the withdrawal will not be available for public use."*

**Response:** As agreed during the 7 July conference call, the last sentence will read as follows:

"DRBC could have even more concerns (in comparison to prior alternatives - e.g., Alt. # 4C and 7) due to the total withdrawal and volume of water unavailable for public use."

AR302622

17. **Comment:** *Page 49, 4.5.1.4 Reduction of Toxicity, Mobility or Volume – The amount of reduction of toxicity, mobility or volume would be minimal at best. Saying that this alternative achieves some reduction is too positive.*

**Response:** As agreed during the 7 July conference call, and consistent with EPA's language in the Record of Decision (ROD) for OU-1, the first sentence of Section 4.5.1.4 will read as follows:

*"The "No Further Action" alternative achieves some limited reduction in toxicity, mobility and volume of the TCE plume."*

18. **Comment:** *Page 49, 4.5.1.4 Reduction of Toxicity, Mobility or Volume – EPA does not believe that the Figures supplied with the model support the statement that the OU1 supply well captures and contains the leading edge of the plume, thus preventing continued plume migration to areas not impacted by the plume.*

**Response:** The fourth sentence of Section 4.5.1.4 has been deleted.

19. **Comment:** *Page 60, 4.5.5.7 Cost – Alternative 5 relies on using the Whistlewood well as the downgradient well. Would the purchase of property be required to pipe the groundwater to the OU1 treatment facility?*

**Response:** The preferred routing of the conveyance pipeline from the DGW to the OU-1 treatment system in Alternative 5 would require access to three properties, which total a maximum of 16 acres. As discussed in our response to Comment 1C in our 29 June submittal, Sequa believes the potential property impacts associated with the conveyance pipeline in Alternative 5 are less than the potential property impacts related to the installation of recovery wells and collection piping/manifold system required to implement Alternatives 7 and 8. Consequently, the purchase of these three properties in part or in their entirety may or may not be necessary. Additionally, Sequa considered the fact that two of the three properties are large commercial properties. Therefore, the potential cost of access for the conveyance pipeline in Alternative 5 should be substantially less than the full property values. Accordingly, Sequa estimated it would be necessary to acquire access to approximately 3 acres to accommodate a reasonable easement for the pipeline. See revised Table C-5, Attachment 1.

20. **Comment:** *Pages 67 and 68, 4.6.1.5 and 4.6.1.6 – Investigate the possibility of discharging the effluent to the existing storm drains.*

**Response:** See response to Comment 1b in Sequa's 29 June submittal.

21. **Comment:** *Page 71, 4.6.2.6 Implementability – How did you arrive at the amount (acreage) to be purchased?*

**Response:** The 25 acres represents the total acreage for the properties (12) where either an extraction well and/or piping would be located. Please note that the acreage indicated for property acquisition does not necessarily mean that amount of property would be acquired; rather, Sequa believes that the cost of acquiring the required access would be equal to or greater than acquiring that amount of property. Therefore, the amount of acreage identified is only for the purpose of providing a cost estimate and does not represent an estimate of how much property will need to be accessed or acquired. See response to Comment 1e in Sequa's 29 June submittal for more detail. See revised Appendix C cost detail sheets for revisions (Attachment 1).

22. **Comment:** *Pages 72 and 75, Cost – Remove NF and footnote 12. Replace with a range of costs and explanation of why the range is necessary.*

**Response:** This has been done – see response to Comment 1a in 29 June submittal.

23. **Comment:** *Page 78, third paragraph, second sentence – Please add “for the areas currently served by the OU1 water line.”*

**Response:** As agreed during the 7 July conference call “for the areas currently served by the OU1 water line” has been added to the last sentence in the first paragraph of Section 5.1.

24. **Comment:** *Table 3, page 3 of 10, Hydraulic Barriers – Evaluate separately the use of extraction and injection wells. The use of extraction wells should not be eliminated. It can be stipulated that extraction wells will be used in conjunction with “pump-and-treat technology”.*

**Response:** As requested, extraction wells and injection wells will be evaluated as separate technologies in Table 3. Extraction wells will be retained as a viable technology, consistent with their role as a

component of several of the remedial alternatives evaluated in Section 4 of the FS.

25. **Comment:** *Table 3, page 7 of 10, OU1 Treatment System – This technology can be eliminated for use with the Source area well, but can be used for downgradient wells as evaluated in Alternative 5.*

**Response:** The screening result for the OU-1 Treatment System will be revised from “eliminated” to “retained”, consistent with its role in Alternative 5.

26. **Comment:** *Table 3, page 9 of 10 – Add discussion of discharge via storm drain system.*

**Response:** As requested, and consistent with Sequa’s response to Comment 1b in its 29 June submittal, discharge of treated ground water to the storm sewer system has been added as a disposal/discharge technology.

27. **Comment:** *Table 3, page 9 of 10, second entry under screening results – Delete one of the periods.*

**Response:** The typographical error has been corrected.

28. **Comment:** *Table 5, Alternative 4C – The OU1 supply well is pumped at 40 gpm not 20 gpm.*

**Response:** The typographical error has been corrected.

29. **Comment:** *Table 6, Page 1 of 1 – Why is the first contaminant level 190 ppb in scenario 2 instead of 200 ppb like all the other modeling scenarios?*

**Response:** For consistency, the concentration for Scenario 2, Model Layer 1, 0 years has been changed to 200 ppb.

30. **Comment:** *Table 7, general comment – Review ratings to ensure they are subjective.*

**Response:** See revised Table 7 included with 29 June submittal.

31. **Comment:** *Table 7, page 1, Alternative 4 C – Alternative 4C was pumping the OU1 well at 40 gpm and the Source Area Well at 20 gpm.*

AR302625

**Response:** The typographical error has been corrected.

32. **Comment:** *Table 7, page 4, Alternative 8, Implementability - Change in accordance with comment #16*

**Response:** This language has been changed to be consistent with the revised language presented in response to Comment #16.

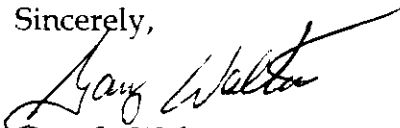
33. **Comment:** *Table 7, page 4, Alternatives 7 and 8, Cost - Change in accordance with comment #23.*

**Response:** The costs for Alternatives 7 and 8 have been changed - see revised Table 7 included with 29 June submittal.

\* \* \* \* \*

Based on the discussions and agreements reached during the 7 July conference call, Sequa is confident that the responses provided above, along with the revisions made to the draft FS will be acceptable to EPA. As agreed during our 30 May meeting, upon notice of approval of the proposed revisions to the FS, Sequa will produce a complete copy of the revised FS document for final distribution. As always, please do not hesitate to call either Brent Murray at 561/624-5747 or me at 410/266-0006 with any questions or comments.

Sincerely,



Gary L. Walters  
Principal-in-Charge

GLW:dmb

Enclosure: Attachment 1

cc: D. Ewald, PADEP  
B. Murray, Sequa  
C. Boyle, Esq., DB&R  
D. Collins, ERM

AR302626